

Joseph V. Womack
Waller & Womack, P.C.
Suite 805 US Bank Building
303 North Broadway
Billings, MT 59101
Telephone: (406) 252-7200
Fax: (406) 252-4266
Email: jwomack@jvwlaw.com
Attorney No. 2641

Attorney for Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA**

In Re:

SCHNEIDER, JOHN HENRY

Debtor(s)

Case No. 14-61357-7

**MOTION FOR APPROVAL TO PAY ADMINISTRATIVE
EXPENSES EXCEEDING \$1,500.00**

COMES NOW Trustee and moves the Court for an order authorizing him to pay administrative expenses exceeding the \$1,500.00 allowed in LBR 2015-1, and in support hereby states as follows:

1. Debtor filed a Chapter 7 Bankruptcy petition on December 4, 2014.
2. Included on his Schedule A is an “Undivided half-interest 3253611 [sic] Tommy Armour Circle, Billings, MT”.
3. The property at 3611 Tommy Armour Circle is vacant. In order to protect the interests of the estate, Trustee seeks to insure the property.
4. Trustee has asserted an interest in the real property in Park County, Wyoming, known as the Whispering Winds Ranch as outlined in the adversary action AP 15-00015.

5. The Whispering Winds Ranch property is vacant. In order to protect the interests of the estate, Trustee seeks to insure the property.

6. Trustee has repeatedly requested a copy of the homeowner's insurance policy and declarations page for each property from Debtor and various counsel; however, Debtor has refused and failed to provide the insurance policies.

7. Given the tenor of the pending adversary litigation and settlement negotiations, Trustee is concerned about both properties being uninsured.

8. Through the Trustee's Insurance Agency, Trustee can obtain insurance coverage for each property. The premium for the Whispering Winds Ranch is \$1,460.00 per month. The premium for the Tommy Armour property is \$540.00 per month.

WHEREFORE, Trustee hereby requests the Court to enter its order approving the payment of the insurance premiums for the 3611 Tommy Armour in Billings, Montana, and the Whispering Winds Ranch in Park County, Wyoming, until such time as any and all interest and ownership in each property has been resolved via settlement or judgment.

DATED this 6th day of May, 2016.

WALLER & WOMACK, P.C.

By: /s/ Joseph V. Womack
Joseph V. Womack
Ch. 7 Bankruptcy Trustee

NOTICE OF OPPORTUNITY TO RESPOND
AND REQUEST A HEARING

If you object to this Motion, you must file a written responsive pleading and request a hearing within fourteen (14) days of the date of filing. The responding party shall schedule the hearing on the motion at least twenty-one (21) days after the date of the response and request for hearing and shall

include in the caption of the responsive pleading in bold and conspicuous print the date, time and location of the hearing by inserting in the caption the following:

NOTICE OF HEARING

Date: _____

Time: _____

Location: _____

If no objections are timely filed, the Court may grant the relief requested as a failure to respond by any entity shall be deemed an admission that the relief requested should be granted.

DATED this 6th day of May, 2016.

WALLER & WOMACK, P.C.

By: /s/ Joseph V. Womack
Joseph V. Womack
Ch. 7 Bankruptcy Trustee

CERTIFICATE OF SERVICE

I, the undersigned, certify under penalty of perjury that on May 6, 2016 or as soon as possible thereafter, a copy of the foregoing was served electronically by the Court's ECF notice to all persons/entities requesting special notice or otherwise entitled to the same and that in addition service by mailing a true and correct copy, first class mail, postage prepaid, was made to the following persons/entities who are not ECF registered users:

John Schneider
3611 Tommy Armour Circle
Billings, MT 59106

John Schneider
543 Camino de Orchidia
Encinitas, CA 92024

Creditor Mailing Matrix

By: /s/ Lynsey Lund
Lynsey Lund
Asst. to Trustee